

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CONSUMER FINANCIAL  
PROTECTION BUREAU,

*Plaintiff,*

v.

TRANSUNION; TRANSUNION, LLC;  
TRANSUNION INTERACTIVE, INC.;  
and JOHN T. DANAHER,

*Defendants.*

Civil Action No. 1:22-cv-01880

District Judge Elaine E. Bucklo

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**JOHN T. DANAHER'S MOTION TO DISMISS THE COMPLAINT WITH PREJUDICE**

Defendant John T. Danaher (“Danaher”) respectfully moves, under Rule 12(b)(6) of the Federal Rules of Civil Procedure, to dismiss with prejudice the Complaint filed by Plaintiff Consumer Financial Protection Bureau (“CFPB”) against Danaher. For the reasons more fully explained in Danaher’s contemporaneously filed motion to dismiss, the CFPB’s sole count against Danaher should be dismissed for at least four reasons. First, Count II should be dismissed because the consent order that underlies Count II cannot be enforced against non-consenting parties like Danaher. Second, Count II should be dismissed to the extent the CFPB seeks damages from Danaher. Third, Count II should be dismissed because it fails to plausibly allege the elements of a cognizable claim against Danaher. Fourth, Count II is time-barred because the CFPB knew or should have known of all alleged facts against Danaher in 2017.

Dated: July 8, 2022

Respectfully Submitted,

By: /s/ Jeffery H. Knox

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*Counsel for Defendant John T. Danaher*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2022, I caused a true and correct copy of the foregoing to be served upon counsel of record as of this date by electronic filing.

By: /s/ Jeffery H. Knox  
*Counsel for Defendant John T. Danaher*